

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re

)

) Case No. \_\_\_\_\_

)

Debtor(s)

)

) RULE 2014 VERIFIED STATEMENT  
) FOR PROPOSED PROFESSIONAL

1. The applicant is not a creditor of the debtor except:
2. The applicant is not an equity security holder of the debtor.
3. The applicant is not a relative of the individual debtor.
4. The applicant is not a relative of a general partner of the debtor (whether the debtor is an individual, corporation, or partnership).
5. The applicant is not a partnership in which the debtor (as an individual, corporation, or partnership) is a general partner.
6. The applicant is not a general partner of the debtor (whether debtor is an individual, corporation, or partnership).
7. The applicant is not a corporation of which the debtor is a director, officer, or person in control.
8. The applicant is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of the debtor.
9. The applicant is not a person in control of the debtor.
10. The applicant is not a relative of a director, officer or person in control of the debtor.
11. The applicant is not the managing agent of the debtor.
12. The applicant is not and was not an investment banker for any outstanding security of the debtor; has not been, within three years before the date of the filing of the petition, an investment banker for a security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor; and is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of such an investment banker.
13. The applicant has read 11 U.S.C. §101(14) and §327, and FRBP 2014(a); and the applicant's firm has no connections with the debtor(s), creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, or any District of Oregon Bankruptcy Judge, except as follows:
14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.

15. Describe details of all payments made to you by either the debtor or a third party for any services rendered on the debtor's behalf within a year prior to filing of this case:
16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:
17. The applicant is not an affiliate of the debtor.
18. Assuming any affiliate of the debtor is the debtor for purposes of statements 4-13, the statements continue to be true except (list all circumstances under which proposed counsel or counsel's law firm has represented any affiliate during the past 18 months; any position other than legal counsel which proposed counsel holds in either the affiliate, including corporate officer, director, or employee; and any amount owed by the affiliate to proposed counsel or its law firm at the time of filing, and amounts paid within 18 months before filing):
19. The applicant hereby acknowledges that he/she has a duty during the progress of the case to keep the court informed of any change in the statement of facts which appear in this verified statement. In the event that any such changes occur, the applicant immediately shall file with the court a pleading to which the original verified statement filed with the court is attached and which describes, by statement paragraph, those changes which have occurred.

THE FOLLOWING QUESTIONS NEED BE ANSWERED ONLY IF AFFILIATES HAVE BEEN LISTED IN STATEMENT 16.

20. List the name of any affiliate which has ever filed bankruptcy, the filing date, and court where filed:

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months:
  
  
  
  
  
  
  
  
  
  
22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:
  
  
  
  
  
  
  
  
  
  
23. List any security interest in any property granted by the debtor to secure any debts of any affiliate not covered in statements 20 and 21. List any security interest in any property granted by the affiliate to secure any debts of the debtor not covered in statements 21 and 22. Also include the collateral, the date and nature of the security interest, the name of the creditor to whom it was granted, and the current balance of the underlying debt:
  
  
  
  
  
  
  
  
  
  
24. List the name of any affiliate who is potentially a "responsible party" for unpaid taxes of the debtor under 26 U.S.C. §6672:

I verify that the above statements are true to the extent of my present knowledge and belief.

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Applicant

**Kotsyubchuk, Slavic and Tanya**  
**Case No. 08-32366-rld11**

**Rule 2014 Verified Statement.**

**Exhibit 1.**

**16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:**

**Slavco, Inc. - Debtors are sole shareholders.**

**Slavco Trucking, Inc. - Debtors are sole shareholders.**

**Slavco Group, LLC - Debtors are sole members.**

**Slavco Custom Homes, LLC - Debtors are sole members (administratively dissolved May 2007).**

**Home & Land LLC - Debtors are sole members.**

**Western Star Investments, LLC - Debtors are sole members (administratively dissolved in February 2006)**

**Kotsyubchuk, Slavic and Tanya**  
**Case No. 08-32366-rld11**

**Rule 2014 Verified Statement.**

**Exhibit 2.**

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months:

Slavic Kotsyubchuk cosigner for Slavco, Inc. to:

Volvo Financial Services  
PO Box 26131  
Greensboro, NC 27402-6131  
Account No. 502-7566940-001  
Contract date: July 10, 2007  
Balance: \$120,000.00  
Payment: \$2,534.74

Diversified Financial Services, LLC  
PO Box 95662  
Chicago, IL 60694  
Account No. 170-0148700-001  
Contract date: 7/12/ 2007  
Amount Financed: \$24,795.00  
Payment: \$607.77

Toyota Financial  
750 SE 122<sup>nd</sup>  
Portland, OR 97233  
Contract Date: 8/21/2007  
Security: 2007 Toyota Tundra 4x4 pickup  
Amount: \$34,365.00

Toyota Financial  
750 SE 122<sup>nd</sup>  
Portland, OR 97233  
Lease Contract Date: 9/13/2007  
Account No. 03 066268515  
Payment: \$486.38

Komatsu Financial  
PO Box 5050  
Rolling Meadows, IL 60008  
Account No. 7770115300.000  
Date: 9/26/2007  
Amount: \$65,250.00  
Payment: \$1,160.55

Slavic and Tanya Kotsyubchuk cosigners for Slavco Trucking, Inc. to:

Paccar Financial Corp.  
PO Box 2374  
Denton, TX 76202  
Account No. 100-693-150-00005869730  
Contract Date: 5/29/2008  
Amount: \$114,449.00  
Payment: \$2,300.00

Paccar Financial Corp.  
PO Box 2374  
Denton, TX 76202  
Account No. 100-693-150-00005877063  
Contract Date: 6/18/2007  
Amount: \$114,810.00  
Payment: \$2,329.00

Paccar Financial Corp.  
PO Box 2374  
Denton, TX 76202  
Account No. 100-693-150-00005879101  
Contract Date: 6/25/2007  
Amount: \$114,810.00  
Payment: \$2,329.00

City Capitol  
PO Box 6229  
Carol Stream, IL 60197  
Amount: \$235,593.00  
Payment: \$4,386.00

**Kotsyubchuk, Slavic and Tanya**  
**Case No. 08-32366-rld11**

**Rule 2014 Verified Statement.**

**Exhibit 3.**

22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:

Slavco Trucking, Inc

owes Tanya

6/5/2008 2:46 PM

Register: Loan Tanya Kotsyubchuk

From 05/17/2007 through 06/05/2008

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Increase	C	Decrease	Balance
05/17/2007		Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to company	300.00			300.00
05/17/2007		Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to company	10,000.00			10,300.00
05/30/2007		Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to company	7,000.00			17,300.00
06/20/2007	6101488	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to company	15,000.00			32,300.00
06/29/2007	6101498	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to company	15,000.00			47,300.00
07/25/2007	109	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	60,000.00			107,300.00
09/07/2007	2622	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	15,000.00			122,300.00
09/18/2007	1110	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			5,000.00	117,300.00
10/05/2007		Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	20,000.00			137,300.00
10/19/2007	1186	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			5,000.00	132,300.00
11/08/2007	1287	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			5,000.00	127,300.00
11/13/2007	1295	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	124,300.00
11/20/2007		Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	10,000.00			134,300.00
11/21/2007	1322	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			10,000.00	124,300.00
12/11/2007	1349	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			5,000.00	119,300.00
12/15/2007	1332	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			5,000.00	114,300.00
12/19/2007	Transfer	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			10,000.00	104,300.00
01/09/2008	1201	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	101,300.00
01/11/2008	1423	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			4,000.00	97,300.00
01/14/2008	1426	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			4,000.00	93,300.00
01/16/2008	1441	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			1,500.00	91,800.00
01/18/2008	848721	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	25,000.00			116,800.00
01/18/2008	1443	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			15,000.00	101,800.00
02/19/2008	1471	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			7,000.00	94,800.00
02/21/2008	1473	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			1,000.00	93,800.00
02/27/2008	1489	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			1,000.00	92,800.00
03/20/2008	1527	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	89,800.00
03/20/2008	1531	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			2,000.00	87,800.00
03/21/2008	236	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan to Compa...	15,000.00			102,800.00
03/26/2008	1551	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			2,000.00	100,800.00
03/27/2008	1553	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	97,800.00
04/04/2008	1571	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,500.00	94,300.00
04/11/2008	1588	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			7,000.00	87,300.00
04/11/2008	1589	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	84,300.00
04/14/2008	1592	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			7,000.00	77,300.00
04/16/2008	1556	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	74,300.00
04/30/2008	1563	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			2,000.00	72,300.00
05/05/2008	1608	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			4,000.00	68,300.00
05/09/2008	1631	Tanya Kotsyubchuk	Washington Mutual Ba...	Loan Payoff			3,000.00	65,300.00

Slavco Trucking, Inc



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06/05/08  
Accrual Basis

**Slavco Rock Products**  
**Invoices for Slavic Kotsyubchu**  
**All Transactions**

<u>Num</u>	<u>Date</u>	<u>Due Date</u>	<u>Aging</u>	<u>Amount</u>	<u>Open Balance</u>
567	2/20/2008	3/10/2008	87	16,500.00	16,500.00
586	2/15/2008	3/10/2008	87	19,000.00	19,000.00
75	10/26/2007	11/5/2007	213	60.56	60.56
76	10/26/2007	11/5/2007	213	393.23	393.23
68	7/26/2007	8/5/2007	305	6,433.50	6,433.50
49	6/15/2007	6/25/2007	346	4,799.50	4,799.50
44	6/13/2007	6/13/2007	358	175.00	175.00
38	5/23/2007	6/2/2007	369	528.00	528.00
15	4/5/2007	4/15/2007	417	24,932.68	24,932.68
<b>Total</b>				<b>72,822.47</b>	<b>72,822.47</b>

*Slavic owes Slavco, Inc*

## Slavco Rock Products

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Register: 22000 - Loan Slavic Kotsyubchuk

From 12/04/2006 through 06/05/2008

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Increase	C	Decrease	Balance
12/04/2006		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	200.00			200.00
01/10/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	10,000.00			10,200.00
04/26/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Comap...	481.00			10,681.00
05/18/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			15,681.00
06/04/2007	2093	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			20,681.00
07/10/2007	2178	Slavic S Kotsyubchuk	Umpqua Bank	Loan to company	5,000.00			25,681.00
07/12/2007	2179	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			30,681.00
07/17/2007	2362	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	7,000.00			37,681.00
07/19/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			8,000.00	29,681.00
08/03/2007	2186	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			34,681.00
08/08/2007	2188	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			39,681.00
08/15/2007	2555	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Comap...	5,000.00			44,681.00
08/24/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	7,220.00			51,901.00
09/04/2007	2572	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	3,000.00			54,901.00
10/05/2007	1157	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	3,000.00			57,901.00
10/09/2007	2631	Slavic S Kotsyubchuk	Umpqua Bank	Loan to Comap...	3,000.00			60,901.00
10/12/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			7,000.00	53,901.00
11/21/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	5,000.00			58,901.00
12/26/2007		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	6,000.00			64,901.00
01/02/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	2,000.00			66,901.00
01/15/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			500.00	66,401.00
02/11/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	1,500.00			67,901.00
03/07/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	3,000.00			70,901.00
03/10/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	500.00			71,401.00
03/11/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	2,500.00			73,901.00
03/14/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	1,000.00			74,901.00
03/21/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	2,000.00			76,901.00
04/04/2008	2524	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			2,000.00	74,901.00
04/04/2008	2525	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			1,000.00	73,901.00
04/11/2008	2546	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			57,000.00	16,901.00
04/16/2008	2568	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			4,000.00	12,901.00
04/17/2008	2570	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			2,500.00	10,401.00
05/08/2008		Slavic S Kotsyubchuk	Umpqua Bank	Loan to Compa...	14,000.00			24,401.00
05/21/2008	5065	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			5,000.00	19,401.00
05/21/2008	5063	Slavic S Kotsyubchuk	Umpqua Bank	Loan Payoff			6,000.00	13,401.00

Slavco, Inc  
owes Slavic

Kotsyubchuk, Slavic and Tanya  
Case No. 08-32366-rld11

**Exhibit 4 to Amended Rule 2014 Verified Statement**

14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.

**There is no interest materially adverse to the interest of the estate. However, Applicant has provided Debtors with a letter outlining a potentially adverse interest concerning a former attorney/employee's representation of the Debtor in litigation. Debtors have been advised to get independent legal advice concerning this matter. Debtor has agreed to continue using the professional services of the Applicant.**

**Debtors have been notified that the potentially adverse interest involves litigation wherein a Applicants' former attorney/employee failed to allege that the plaintiffs' claims may have been time barred by the applicable statute of limitations and that defense was not presented to the court in the initial pleading and therefore may have been waived. Debtors have been notified that there is no assurance that the claims would have been barred by the applicable statute of limitations, merely that the possibility existed. The Applicant has also notified Debtors that they may have a claim against the attorney for their attorneys' fees and costs should the Applicant continue as counsel in the same matter. In addition, Applicant has notified Debtors that they may have a claim against Applicant in vicarious liability/respondeat superior for the former attorneys' omissions. However, Applicant notes that such a claim is very unlikely in that the experienced attorney was the only person who worked on the case. Applicant has notified the Debtors that the Applicant no longer employs the attorney. The potential claim would amount to less than the former attorney/employee's basic professional liability policy limit of \$300,000.**

Jessica S. Cain  
Of Attorneys for Debtors-in-Possession  
Gunn Cain & Kinney LLP  
700 Deborah Road, Suite 250  
Newberg, OR 97132  
Phone: (503) 538-8318  
Fax: (503) 537-0591

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re:

SLAVIC S. KOTSYUBCHUK and TANYA F.  
KOTSYUBCHUK,

Debtors-in-Possession.

Case No.: 08-32366-rld11

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Amended Rule 2014 Verified

Statement of Proposed Professional on:

All County Surveyor and Planners Inc.  
Dale L. Hult, President  
PO Box 955  
Sandy, OR 97055

Bankruptcy Exchange Inc  
2952 Seneca St  
West Seneca, NY 14224

Executive Financial Solutions, Inc.  
Ella Gurfinxel, President  
4942 NW 146th Pl.  
Portland, OR 97229

IRS  
Insolvency Group III  
M/S O240  
1220 SW 3rd Ave  
Portland, OR 97204

May & Associates, Inc.  
12945 SW 135<sup>th</sup> Avenue  
Tigard, OR 97223

ODR Bkcy  
955 Center St NE  
Salem, OR 97301-2555

Amy Joseph Pedersen  
Stoel Rives  
900 SW Fifth, Suite 1600  
Portland, OR 97204

Recovery Management Systems Corporation  
25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131

Volvo Financial Services  
c/o Lawrence Cooper  
7025 Albert Pick Rd #105(27409)  
POB 26131  
Greensboro, NC 27402

Want & Emery CPAs PC  
PO Box 1029  
Newberg, OR 97132

by mailing a copy of said documents to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Newberg, Oregon, on April 30, 2009, postage prepaid.

The following were served electronically by the Court on April 30, 2009:

Thomas K. Hooper for FMCC and Key Bank  
Via ECF: [bmail@hooplaw.com](mailto:bmail@hooplaw.com) and [csayles@hooplaw.com](mailto:csayles@hooplaw.com)

Joe Lozano for Litton Loan Servicing, LP, Bank of America and Kubota Credit Corporation  
Via ECF: [notice@bkcyllaw.com](mailto:notice@bkcyllaw.com)

David E. McAllister for Homecomings Financial and National City Mortgage, Co.  
Via ECF: [ecforb@piteduncan.com](mailto:ecforb@piteduncan.com)

Scott Hutchinson for National Banking Association and National City Bank  
Via ECF: [ecforb@piteduncan.com](mailto:ecforb@piteduncan.com)

Brandy A. Sargent for Jennifer Thompson and Joseph Martinez  
Via ECF: [basargent@stoel.com](mailto:basargent@stoel.com) and [docketclerk@stoel.com](mailto:docketclerk@stoel.com)

John D. Schlotter for Litton Loan Servicing, L.P. and America's Servicing Company  
Via ECF: [bkmail@mrdefault.com](mailto:bkmail@mrdefault.com)

Matthew R. Cleverley for Aurora Loan Services  
Via ECF: [mcleverley@mccarthyholthus.com](mailto:mcleverley@mccarthyholthus.com) and [amichael@mccarthyholthus.com](mailto:amichael@mccarthyholthus.com)

Lisa M. McMahon-Myhran for Saxon Mortgage Services  
Via ECF: [ecfor@rcflegal.com](mailto:ecfor@rcflegal.com)

Dean Prober for Countrywide Home Loans Servicing, LP  
Via ECF: [cmartin@pprlaw.net](mailto:cmartin@pprlaw.net) and [cmcnamara@pprlaw.net](mailto:cmcnamara@pprlaw.net)

David B. Schumacher for Greenpoint Mortgage Funding, Inc.  
Via ECF: [schulaw@comcast.net](mailto:schulaw@comcast.net)

Kelly D. Sutherland for Citibank, NA as trustee for Structured Asset Securities Corp OCWEN  
Via ECF: [s&k-or.ecf.wa@logs.com](mailto:s&k-or.ecf.wa@logs.com) and [crocha@logs.com](mailto:crocha@logs.com)

Ted A. Troutman for Suresh Paranjpe  
Via ECF: [tedtroutman@sbcglobal.net](mailto:tedtroutman@sbcglobal.net) and [rusty@muir-troutman.com](mailto:rusty@muir-troutman.com)

U.S. Trustee, Portland  
Via ECF: [USTPRegion18.PL.ECF@usdoj.gov](mailto:USTPRegion18.PL.ECF@usdoj.gov)

Gilbert B. Weisman for American Express Bank FSB  
Via ECF: [notices@becket-lee.com](mailto:notices@becket-lee.com)

Jennifer L. Aspaas for Bank of America, Citibank, Litton Loan Servicing and America's Servicing Company  
Via ECF: [ecfor@rcflegal.com](mailto:ecfor@rcflegal.com)

Jason M. Ayres for Elroy Prosch  
Via ECF: [jayres@fwwlaw.com](mailto:jayres@fwwlaw.com) and [cmontee@fwwlaw.com](mailto:cmontee@fwwlaw.com)

DATED: April 30, 2009

GUNN CAIN & KINNEY LLP

/s/ Jessica S. Cain  
\_\_\_\_\_  
Jessica S. Cain, OSB #030857  
Attorney of Record for Debtors-in-Possession